

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE APACHE CORP. SECURITIES
LITIGATION

Case No. 4:21-cv-00575

District Judge George C. Hanks, Jr.

Magistrate Judge Andrew M. Edison

CLASS ACTION

**LEAD PLAINTIFFS' NOTICE OF FILING UNREDACTED COPIES OF THE
DECEMBER 6, 2023 EVIDENTIARY HEARING DIRECT TESTIMONY OF
ZACHARY NYE, Ph.D. AND EXHIBITS 8, 25, AND 26 THERETO**

Pursuant to the Court's December 1, 2023 Order (Dkt. 145) ("Order"), Lead Plaintiffs, Plymouth County Retirement Association and the Trustees of the Teamsters Union No. 142 Pension Fund (together, "Plaintiffs"), respectfully submit this notice to inform the Court that the parties have conferred concerning the redacted portions of the Direct Testimony of Zachary Nye Ph.D., dated November 29, 2023 (the "Nye Testimony") and the confidentiality designations affixed to Exhibits 8, 25, and 26 thereto. As a result of such communications, counsel for Apache has informed counsel for Plaintiffs: "Had Lead Plaintiffs conferred with Defendants prior to filing the sealing motion, Defendants would have informed Lead Plaintiffs that Defendants were not opposed to the public filing of Exhibits 8, 25, and 26 to Dr. Nye's proposed testimony. Defendants therefore consent to the public filing of those exhibits and Dr. Nye's unredacted proposed testimony discussing those exhibits."

Accordingly, Plaintiffs are filing unredacted copies of the Nye Testimony and Exhibits 8, 25, and 26 thereto.

Dated: December 4, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on December 4, 2023, I caused a true and correct copy of the foregoing to be electrically filed with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to counsel of record by operation of the Court's electronic filing system.

s/ Thomas R. Ajamie

Thomas R. Ajamie